



THE CITY OF NEW YORK
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December 12, 2017

BY ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 11201

MEMO ENDORSED

Re: Jasmine Bridgeforth, et al. v. City of New York, et al.
16-CV-273 (WHP) (RLE)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent Defendants City of New York, Detective John Zerafa, Police Officer Rafael Sanchez, Police Officer Mohammed Khan, Sergeant Demetrious Lee, and Retired Deputy Inspector Luis Despaigne (hereinafter referred to collectively as "Defendants") in the above-referenced matter. Defendants write to respectfully request a brief one-week extension of time, from December 15, 2017 to and including December 22, 2017, to file Defendants' Motion for Summary Judgment, and a corresponding extension of the remaining briefing schedule. This is Defendants' first request for an extension of the briefing schedule.

This request is primarily due to the conflicting professional obligations of the undersigned. Although the undersigned conferred with Ryan Lozar, Plaintiffs' counsel, to obtain his consent to a one-week extension of the briefing schedule, and counsel consented to the one-week extension itself, he wanted an opportunity to review the IAB documents recently produced.¹ However, due to the relatively close deadline for the submission of Defendants'

¹ Plaintiffs' counsel communicated that, while he would give his consent to a one-week extension of time, he wished to review the production of NYPD Internal Affairs Bureau ("IAB") documents the undersigned served upon him on December 1, 2017, in order to determine if there are additional issues to raise with

moving papers, Defendants thought it best to make the instant application as soon as practicable in order to provide the Court with as much advance notice of this request as possible, and communicated same to counsel.

Based on the foregoing, Defendants respectfully request a one-week enlargement of the briefing schedule of Defendants' Motion for Summary Judgment as follows: (1) Defendants to file their moving papers on December 22, 2017; (2) Plaintiffs to file their opposition on January 31, 2018; and (3) Defendants to file any reply papers by February 5, 2018.

Defendants thank the Court for its time and consideration in this regard.

Respectfully submitted,

/s/

Elizabeth Bardauskis
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Ryan Lozar, Esq. (by ECF)
Attorney for Plaintiffs

Application granted. This Court adopts Defendants' proposed briefing schedule.

Dated: December 13, 2017
New York, New York

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

the Court. Defendants submit that any such review has no bearing on the timing of the submission of the summary judgment motion.